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COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
PACIFIC GAS AND ELECTRIC COMPANY,  
  
Defendant.

Case No. 14-CR-00175-WHA

**FURTHER SUBMISSION IN  
RESPONSE TO QUESTION 2 IN  
ORDER FOR FURTHER  
RESPONSES RE DIXIE FIRE**

Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this further submission in response to Question 2 in the Court’s September 14, 2021 order (Dkt. 1470).

**Question 2:**

*As a single exhibit, provide all PG&E (and partner, contractor, etc.) internal emails, texts, memos, and other documents created on July 13 or 14, 2021, pertaining to the July 13 incident on the Bucks Creek 1101 line, and separately summarize them.*

**PG&E Further Response:**

Consistent with PG&E’s September 24, 2021 submission (Dkt. 1479), PG&E is delivering to the Court on October 12, 2021 a thumb drive containing electronic copies of 1,377 documents bearing Bates PGE-DIXIE-NDCAL-000019193 to PGE-DIXIE-NDCAL-000021793 that PG&E has identified as responsive to this request.<sup>1</sup> These documents include emails, messages, maps, and other documents from July 13-14, 2021 that have been collected from Custodians, as described in PG&E’s September 24, 2021 submission. *See* Dkt. 1479 at 4-5. As with the thumb drive PG&E submitted on September 28, 2021, PG&E is not able to provide the documents as a single exhibit because the documents are different file types, some of which are produced as PDF images (e.g., .msg files) and some of which are produced in native format (e.g., .xls files). To facilitate the Court’s review, the thumb drive includes (1) a combined PDF of the entire production, with slipsheets for documents being produced in native format, and (2) an index identifying the Bates range and custodian(s) for each document family in the production.

As set forth in PG&E’s September 24, 2021 submission, certain documents being provided to the Court contain personally identifying information and other confidential information. PG&E is in the process of identifying this confidential information and will prepare and deliver a redacted set and file a corresponding administrative motion to seal.

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<sup>1</sup> As set forth in PG&E’s September 24, 2021 submission, PG&E does not interpret the Court’s question as calling for information protected by the attorney-client privilege or attorney work product protection. Where applicable, PG&E is redacting portions of documents determined to be protected by attorney-client privilege or to constitute attorney work product.

PG&E is also including on the thumb drive a corrected set of the documents PG&E previously delivered to the Court on September 28, 2021. This corrected set addresses processing issues identified with respect to certain documents that had been collected from Mobile Custodians. The corrected set includes all of the documents delivered to the Court on September 28, 2021, but the total page count of the production has changed as a result of the re-processing, and the documents bear new Bates numbers, PGE-DIXIE-NDCAL-000018126 to PGE-DIXIE-NDCAL-000019192. PG&E is providing a revised index for this production that shows how the previous Bates numbers for each document and document family in the original set provided on September 28, 2021 correspond to the new Bates numbers in the corrected set being provided on October 12, 2021.

PG&E is continuing to collect and review documents in response to this request, as set forth in its September 24, 2021 submission, and will provide additional documents to the Court on a rolling basis. PG&E anticipates making one or two more productions to the Court. Upon submission of the final production, PG&E will provide a summary of the document production in response to this request.

Dated: October 12, 2021

Respectfully Submitted,

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